

UNITED STATES DISTRICT COURT

United States District Court
Albuquerque, New Mexicofor the
District of New MexicoMitchell R. Elfers
Clerk of CourtUnited States of America
v.
Maria De Jesus Ramos RodriguezCase No. **25mj1096**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2025 in the county of Cibola in the
District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)

Possession with intent to distribute 500 grams or more of methamphetamine

This criminal complaint is based on these facts:

See affidavit, incorporated herein by reference.

☒ Continued on the attached sheet.LUC V
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Date: 2025.05.02
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Complainant's signature

Luc LaBelle, Special Agent

Printed name and title

Telephonically sworn and electronically signed.

Date: 05/02/2025City and state: Albuquerque, NM

Judge's signature

Hon. Laura Fashing, US Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA DE JESUS RAMOS

RODRIGUEZ,

Defendant

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT

Your affiant, Luc Vance LaBelle, duly sworn, hereby depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (HSI) and have been since September 2024. As such, I am an investigator or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered to conduct investigations of, and to make arrests for, the offenses enumerated in Titles 8, 18, 19, 21, and 31 of the United States Code and other related offenses. As part of my employment with HSI, I completed approximately 500 hours of instruction at the Federal Law Enforcement Training Centers (FLETC) in Glynco, Georgia, graduating from the Criminal Investigator Training Program in June 2024. In September 2024, I graduated from the HSI Special Agent Training Program, completing an additional 500 hours of instruction in investigative techniques including but not limited to narcotics investigations, firearms investigations, and import/export related investigations. Prior to my employment with the HSI, I was in the U.S. Army as an intelligence officer in

3rd Battalion, 75th Ranger Regiment. My duties while serving in 3rd Battalion, 75th Ranger Regiment included many technical and tactical tasks to include targeting and eliminating terrorist groups/fighters (Taliban, Islamic State Khorasan Province (ISIS-K), and Al-Qaeda in the Indian Sub-continent (AQIS) among others). I served in the United States Army from May 2018 to February 2024 leaving service as a Captain (O-3).

2. I am presently assigned to the HSI Deputy Special Agent in Charge (DSAC) Albuquerque, New Mexico, duty station. In that capacity, my duties include investigating federal criminal offenses in the District of New Mexico.

3. The information set forth in the affidavit had been derived from my own investigation or communicated to me by other sworn law enforcement officers or from other reliable sources. This affidavit does not set forth all of my knowledge related to this investigation. It is submitted for the limited purpose of establishing probable cause to support a criminal complaint charging Maria De Jesus Ramos RODRIGUEZ (RODRIGUEZ) with the following crimes:

- a. 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), that being possession with intent to distribute 500 grams or more of methamphetamine.

PROBABLE CAUSE

4. On the evening of May 1st, 2025, New Mexico State Police (NMSP) Officer Juan Rodriguez, who is also a Task Force Officer (TFO) with the Department of Homeland Security Homeland Security Investigations (HSI), was on duty, in full uniform, in his marked patrol unit conducting routine traffic enforcement on Eastbound Interstate 40 near Laguna Pueblo, NM.

5. On the same day, at approximately 2300 hours, Officer Rodriguez observed a red Toyota C-HR displaying California license plate “8WOX165” traveling at an unsafe distance behind a semi-truck and subsequently conducted a traffic stop of the vehicle.

6. Upon making contact with the sole occupant of the vehicle, a female driver, the female driver of the vehicle provided Officer Rodriguez with a California driver’s license bearing the name: Maria De Jesus Ramos RODRIGUEZ (date of Birth: 01/02/1978).

7. The registered owner of the Toyota C-HR was found to be RODRIGUEZ.

8. During the traffic stop RODRIGUEZ appeared to have short shallow breaths and her hands were shaking consistent with signs of nervousness. When asked by Officer Rodriguez about her travel intentions she stated she was headed to Oklahoma for two days. However, in plain view Officer Rodriguez noted that the amount of luggage in the vehicle did not appear consistent with a two-day stay, because there were two large suitcases.

9. When asked if there was anything illegal in the vehicle, RODRIGUEZ appeared to become more nervous.

10. Officer Rodriguez obtained verbal consent from the female driver to search the vehicle. During a subsequent search Officer Rodriguez located two black trash bags inside the trunk of the vehicle which contained:

(a) two plastic wrapped green colored bricks; and

(b) two clear bags containing a white crystalline substance.

11. A preliminary test of some of the bricks/bags was found to be presumptive positive for the properties of methamphetamine. The bricks/bags were subsequently weighed and found to weigh approximately 14.03 kilograms (gross weight).

12. In my training and experience the manner in which the unidentified substance was packaged is consistent with bulk narcotics trafficking. Final testing and lab results are pending.

13. HSI Agents responded to the HSI Albuquerque office to process and interview the occupant of the vehicle. RODRIGUEZ was advised of her Miranda rights but agreed to continue answering questions without a lawyer present.

14. During a subsequent interview she admitted to entering the United States illegally when she was 12 years old.

15. When questioned about the narcotics located in her vehicle, RODRIGUEZ denied knowing the type or amount of narcotics that she was transporting and denied ever physically handling the narcotics. She did, however, indicate she was expected to drive to a drop off location in New Mexico.

16. Based on the information set forth above, I submit there is probable cause to believe that on or about May 1st, 2025, in the County of Cibola in the District of New Mexico, Maria De Jesus Ramos Rodriguez did knowingly and intentionally possess with the intent to distribute 500 grams or more of methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

17. Assistant United States Attorney Elaine Ramirez approved this affidavit.

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Luc V. LaBelle
Special Agent
Homeland Security Investigations
Department of Homeland Security

Digitally signed by LUC V
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Subscribed and sworn telephonically and signed electronically on May 02, 2025:


Honorable Laura Fashing
United States Magistrate Judge